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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

**RECEIVED**

**APR 27 2022** *SH*

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

**JURY TRIAL**

**DEMANDED**

22-CV-2216  
Judge Kennelly  
Magistrate Judge Weisman  
RANDOM

**ZAKKIYYA A GREENE**

**JANE DOE 1 (J.M), JANE DOE 2 (J.M), JANE DOE 3 (J.M)**

**PLAINTIFF**

**VERSE**

**CHICAGO PUBLIC SCHOOL**

**BURNHAM ELEMENTRY ADMINISTRATION STAFF**

**SHERYL FREEMAN (PRINCIPAL)**

**CASSANDRA LOCKRIDGE (ASSISTANT PRINCIPAL)**

**DEFENDANT**

**PEDRO MARTINEZ (CHIEF EXECUTIVE OFFICER/  
SUPERINTENDENT)**

**CHICAGO PUBLIC SCHOOL DISTRICT #299  
(NCES DISTRICT ID:1709930)**

**CHICAGO BOARD OF EDUCATION**

**COMPLAINT**

**COMES NOW, PRO SE PLAINTIFF ZAKKIYYA GREENE** in the above style and number to be determined by the court and bring forth this civil complaint

against CHICAGO PUBLIC SCHOOL BURNHAM ELEMENTARY ADMINISTRATION STAFF, CHICAGO PUBLIC SCHOOL CHIEF OFFICER/ SUPERINTENDENT, CHICAGO PUBLIC SCHOOL DISTRICT #299, CHICAGO BOARD OF EDUCATION, and in support thereof will show unto the Court the following: Violation of Plaintiff First, Seventh, Ninth, and Fourteenth Amendment Rights.

## **FACTS**

### **I**

That I am Zakkiyya Greene parent of **Jane Doe 1 (J.M)**, **Jane Doe 2 (J.M)**, and **Jane Doe 3 (J.M)** (I will refer to my children as **DOE** to reserve their privacy on public record at this time) (**Doe 1-3** will be referring from eldest to youngest). We live at the location of 99<sup>TH</sup> South Paxton Avenue Chicago, IL 60617.

### **II**

That Defendant Pedro Martinez Chief Executive Officer of Chicago Public School, address 42 West Madison Street Chicago, IL 60602

### **III**

That defendant Sheryl Freeman Principal of Burnham Elementary Chicago Public School is located on 9928 South Crandon Avenue Chicago, IL 60617.

### **IV**

That defendant Cassandra Lockridge Asst. Principal of Burnham Elementary

Chicago Public School is located at 9928 South Crandon Avenue Chicago, IL 60617.

**V**

That the defendant City of Chicago Public School District #299 located at 42 West Madison Street 2<sup>nd</sup> Floor Chicago, IL 60602-4413.

**VI**

That the defendant City of Chicago Public School Board of Education located at 1 North Dearborn Street Suite # 950 Chicago, IL 60602.

**VII**

That the Jane Doe's referenced above has been in Chicago Public School attendance on or about November of 2020 at the location of Edward Bouchet Elementary; 7355 South Jeffery Avenue Chicago Il, 60649.

**VIII**

That during their time of attendance at Chicago Public School Edward Bouchet located on 7355 South Jeffery Chicago, IL 60649, I Zakkiyya Greene and the **Jane**

**Doe's** in reference was living at the location of 7255 South Bennett Chicago, IL 60617.

## **IX**

That from on or about the 09<sup>th</sup>-27<sup>th</sup> of September 2021 complaints were made to Mrs.C Keneipp the first-grade teacher at Edward Bouchet Elementary, concerning JANE DOE 3 referenced above being bullied at the location of Edward Bouchet Elementary Chicago Public School location referenced above.

## **X**

That from on or about the 28<sup>th</sup> day of September 2021 a conference was held with I and the school administrators at the location of Edward Bouchet Elementary (refer to the location above).

## **XI**

That from on or about the 29<sup>th</sup> day of September 2021 a complaint was filed against Mrs. C Keneipp through telephone and Email, to the Illinois State Board of Education located on 555 West Monroe Street, Suite 900.

## **XII**

That from on or about the October of 2021 JANE DOE 1-3 were transferred to Chicago Public School Burnham Elementary located on 9928 South Crandon Chicago, IL 60617.

## **XIII**

That from on or about the 7<sup>th</sup> day of December 2021 at Chicago Public School Burnham Elementary at the location of 9928 South Crandon Chicago, IL 60617 Chicago Public School Security officer Raymond Baines inappropriately grabbed JANE DOE 2 in an aggressive manner.

## **XIV**

That from on or about the 7<sup>th</sup> day of December 2021 a 7<sup>th</sup>-grade young man grabbed Jane Doe 2 in an aggressive manner at the Chicago Public School Burnham Elementary.

## **XV**

That from on or about the 8<sup>th</sup> day of December 2021 a conference about the incident in relation to the date of December 7<sup>th</sup>, 2021, complaint, was held with I (Plaintiff), JANE DOE 1, JANE DOE 2, and Chicago Public school Burnham

Elementary administrators, the security officer, the gym teacher, and the two children involved (both male).

## **XVI**

That from on or about the 8<sup>th</sup> day of December 2021 an incident report related to JANE DOE 1-3 was requested from Chicago Public School Burnham Elementary administrators.

## **XVII**

That from on or about the 8<sup>th</sup> day of December 2021 the incident in relation to JANE DOE 1-3 was also reported Chicago Public School Student Safety operator Ceaser at the phone number (773-553-3335).

## **XVIII**

That from on or about the 9<sup>th</sup> day of December 2021 incident report in relation to JANE DOE 1-3 was requested from Chicago Public School Burnham Elementary administrators, none was given.

## **XIX**

That from on or about the 10<sup>th</sup> day of December 2021 JANE DOE 1-3 no longer attended class at Chicago Public School Burnham Elementary.

**XX**

That from on or about the 11<sup>th</sup> day of December 2021 thru the 14<sup>th</sup> day of February 2022 the Chicago Public School Burnham Elementary Harassed Plaintiff Zakkiyya Greene relating to attendance issues at the facility.

**XXI**

That from on or about the 4<sup>th</sup> day of February 2022 a conference was held with Plaintiff Zakkiyya Greene and Chicago Public School Burnham Elementary administrators, an incident report in relation to JANE DOE 1-3 was requested.

**XXII**

That from on or about the 8<sup>th</sup> day of February 2022 Chicago Public School Student Safety Security supervisor Nick was asked for a follow-up on an incident report related to JANE DOE 1-3 from the 8<sup>th</sup> day of December 2021 at the Chicago public School Burnham Elementary (location refer above).

**XXIII**

That from on or about the 11<sup>th</sup> day of February 2022 an incident report related to JANE DOE 1-3 was given to Plaintiff Zakkiyya Greene from the Chicago Public

School Burnham Elementary administrator Cassandra Lockridge.

**XXIV**

That from on or about the 14<sup>th</sup> day of February 2022 JANE DOE 1-3 returned in attendance at the location of Chicago Public School Burnham elementary (location refer above).

**XXV**

That from on or about the 22<sup>nd</sup> day of February 2022 Chicago Public School Burnham elementary staff member Joseph Puckett (unauthorized teacher) did not respond to JANE DOE 1 (student) complaint about a battery in the classroom.

**XXVI**

That from on or about the 22<sup>nd</sup> day of February 2022 Chicago Public School administrators Sheryl Freeman and Cassondra Lockridge did not respond to the battery complaints from student (JANE DOE 1) or parent.

**XXVII**

That from on or about the 22<sup>nd</sup> day of February 2022 the Chicago Police was called

to Chicago Public School Burnham Elementary.

**XXVIII**

That from on or about the 22<sup>nd</sup> day of February 2022 the Chicago Police issued a police report for battery on JANE DOE 1 at Chicago Public School Burnham Elementary School.

**XXIX**

That from on or about the 22<sup>nd</sup> day of February JANE DOE 1 was taken to the emergency room about injuries sustained during battery incident at Chicago Public School Burnham Elementary (location refer above).

**XXX**

That from on or about the day 24<sup>th</sup> day of February, I the plaintiff tried to obtain a summons from Court Branch for warrant or Summons located on 727 E 111<sup>th</sup> st. for the child involved in the incident against JANE DOE 1.

**XXXI**

That from on or about the 24<sup>th</sup> day of February I the plaintiff was told by Court branch officer (location refer above) to contact the Chicago Police Special Victims Unit at the phone number 312-747-8247 and spoke with Detective Anderson.

Detective Anderson instructed Plaintiff to call the Violent Crimes Unit branch of the Chicago Police dept at 312-747-8271 to speak with Detective Allen.

**XXXII**

That on or about the 24<sup>th</sup> day of February Plaintiff tried contacting Detective Allen. Detective Allen was said to be off work on this date.

**XXXIII**

That on or about the 24<sup>th</sup> day of February 2022 the Chicago Police emergency phone number was contacted to arrest the offender in the incident against JANE DOE 1.

**XXXIV**

That day on or about the 24<sup>th</sup> of February the Illinois Board Of Education investigator-special assistant and the assistant legal council were contacted by phone and Email regarding a complaint against Chicago Public School Burnham Elementary Staff members.

**XXXV**

That from on or about the 25<sup>th</sup> day of February the [inspectorgeneral@cpsoig.org](mailto:inspectorgeneral@cpsoig.org)

was contacted thru email regarding the complaint from the Chicago Public School Burnham Elementary.

**XXXVI**

That from on or about the 24<sup>th</sup> day of February the Chicago Public School Student Safety Center was contacted by telephone at number 773-553-3335.

**XXXVII**

That from on or about the 24<sup>th</sup> of February the Chicago Public School Student Protection Center was contacted by telephone at 773-535-4400.

**XXXVIII**

That day on or about the 25<sup>th</sup> of February 2022 the Chicago Police detective Allen was called again for assistance with the incident from February 22<sup>nd</sup>, 2022 police report.

**XXXIX**

That on or about the 25<sup>th</sup> of February 2022 the Chicago Police dept Emergency phone number was called again to arrest the offender in the incident from February 22<sup>nd</sup>, 2022 battery incident.

**XL**

That from on or about the 25<sup>th</sup> day of February 2022 the Chicago Police 4<sup>th</sup> district department located on 2255 East 103<sup>rd</sup> Street Chicago IL 60617 was called concerning the arrest of the offender from the incident on February 22<sup>nd</sup>, 2022.

### **XLI**

That on or about the 25<sup>th</sup> day of February 2022 the Chicago police officer Adams, Detective Guadinski, Sergeant Anderson, and Commander at the Chicago police 4<sup>th</sup> district was notified about I the Plaintiff needing assistance with the arrest of the offender from the battery incident on February 22<sup>nd</sup>, 2022.

### **XLII**

That on or about the 25<sup>th</sup> day of February 2022 the Chicago Public School Student Safety Center was notified again about the incidents that were in an occurrence at the Chicago Public School Burnham Elementary at the telephone number 773-553-3335.

### **XLIII**

That day on or about the 25<sup>th</sup> day of February 2022 the Chicago Public School Network 13 also known as Chicago Public School District #299 was notified by telephone of the incidents that were in an occurrence at Chicago Public School Burnham Elementary.

**XLIV**

That on or about the 25<sup>th</sup> day of February 2022 investigator McClary from the Office of Inspector General of Chicago Public Schools was given information to report to the Law Department of OIG Office of Inspector General.

**XLV**

That day on or about the 25<sup>th</sup> day of February 2022 the Illinois Board of Education was contacted concerning incidents in an occurrence at the Chicago Public School Burnham Elementary.

**XLVI**

That on or about the 27<sup>th</sup> day of February 2022 the Chicago Public school student protection was notified again of the incident concerning the JANE DOE 1-3 at Chicago public schools.

**XLVII**

That on or about the 3<sup>rd</sup> of March 2022 Chicago police detective unit was contacted again concerning Detective Allen's service to the report received on the incident that occurred on February 22<sup>nd</sup>, 2022, at Chicago Public School Burnham Elementary.

**XLVIII**

That on or about the 3<sup>rd</sup> of March 2022 the Chicago Police Emergency phone number was contacted about the arrest of the offender from the incident reported on February 22<sup>nd</sup>, 2022, at Chicago Public School Burnham Elementary.

### **XLIX**

That1 on or about the 3<sup>rd</sup> of March 2022 the Law Department of the Officer Inspector General of Chicago public school was contacted in relation to the incidents in an occurrence at the Chicago public school Burnham Elementary.

### **L**

That on or about the 3<sup>rd</sup> of March 2022 Janelly Nieves Investigative aide of the Chicago Board of Education Law department investigative unit was contacted concerning the incidents in an occurrence at the Chicago Public School Burnham Elementary.

### **LI**

That on about the 7<sup>th</sup> day of March 2022 the Chicago public school Chief Executive Officer Pedro Martinez and Chief Education officer were contacted thru email in relation to the incidents that had been occurring at Chicago Public school Burnham elementary located on 9928 s Crandon Chicago, IL 60617.

**LII**

That JANE DOE 1-3 referenced above has not been in attendance of Chicago Public School and has not been assisted with any services provided by Chicago Public School Chief Executive Officer Pedro Martinez system for attendance.

**LIII**

That **Jane Doe 1-3** referenced above are members of the Cheerleading Team and Student Council at Chicago Public School Burnham Elementary.

**LIV**

That **Jane Doe 1-3** referenced above are straight-A students academically with no behavior issues at Chicago Public Schools.

**LV**

That **Jane Doe 3** has been placed in a grade up from her original status at Chicago Public School.

**LVI**

That Chicago Public School Chief Executive Officer Pedro Martinez acted upon

Deprivation of rights under color of law.

**LVII**

That Chicago Public School Edward Bouchett administration team acted upon

Deprivation of rights under color of law.

**LVIII**

That Chicago Public School Burnham Elementary administration team acted upon

Deprivation of rights under color of law.

**LVIX**

That the Chicago Board of Education team acted upon Deprivation of rights under  
color of law.

**LX**

That the CHICAGO PUBLIC SCHOOL DISTRICT #299

(NCES DISTRICT ID:1709930) team acted upon Deprivation of rights under the  
color of law.

**LXI**

That Chicago Public School Burnham Elementary Principal Sheryl Freeman acted under the color of the state of Illinois.

**LXII**

That Chicago Public School Burnham Elementary Assistant Principal Cassondra Lockridge acted under the color of the state of Illinois.

**LXIII**

That Chicago Public School Burnham Elementary Security Officer Raymond Baines acted under the color of the state of Illinois.

**LXIV**

That Chicago Public School Burnham Elementary Gym teacher David Rossi acted under the color of the state of Illinois.

**LXV**

That Chicago Public School Burnham Elementary (employee listed as other) Joseph Puckett acted under the color of the state of Illinois.

**LXVI**

That the Defendants set in motion a series of acts by others or knowingly Refusing to terminate a series of acts by other which they knew or reasonably should have known would cause others to inflict constitutional injury.

### **LXVII**

That the Defendants has shown culpable action Or inaction in training, for supervision or control of subordinates.

### **LXVIII**

That the defendant Pedro Martinez Chicago Public School Chief Executive Officer conduct showed a reckless or callous indifference to the rights of Plaintiff.

### **LXIX**

That the Defendants were negligent by failure to use care as a reasonable prudent and careful person would use under similar circumstances including a broad range of acts or failures to act that result in Plaintiff hardship.

**LXX**

That the Defendant Chicago Public School Chief Executive Officer/Superintendent Pedro Martinez was personally involved in the sense of helping to cause A CIVIL RIGHT VIOLATION and acted intentionally, with sadistic intent.

**LXXI**

That the Defendants created a policy or custom under which unconstitutional practices occurred and allowed the continuance of such a policy or custom.

**WHEREFORE PREMISES CONSIDERED**, Plaintiff, Zakkiyya Greene, and JANE DOE 1-3 Pray that this honorable court set a time and date to hear this matter with a Jury to determine a dollar amount that should be paid to the Plaintiff for Monetary, Compensatory and Punitive Damages.

**Respectfully Submitted,**



**Zakkiyya Greene Pro Se Plaintiff**

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